

EXHIBIT B

TRANSCRIPT OF RECORDED STATEMENTS OF

MJM CASE NUMBER: TOK173661

APPEARANCES:

**Gerard Trimboli, Investigator
MJM Investigations, Inc.
910 Paverstone Drive
Raleigh, North Carolina 27615
(800) 927-0456**

**Recorded statements of Barbara Warnock and Patricia Harris-Lee
taken on April 21, 2006, transcribed from audiotape by Jacquie Charns.**

Volume 1 of 1

Pages 1 through 89, inclusive

MJM Investigations, Inc.,

**910 Paverstone Drive
Raleigh, North Carolina 27615**

(800) 927-0456

Strengthening the Value of Insurance ®

I N D E X

Personal Interviews

EXAMINATION OF: Barbara Warnock

By Investigator: Gerard Trimboli

Pages 3 - 41

EXAMINATION OF: Patricia Harris-Lee

By Investigator: Gerard Trimboli

Pages 42 - 89

1 April 21, 2006

2 4:45 P.M.

3 * * *

4 The CLAIMANT herein, having given permission to voluntarily
5 participate in a recorded statement, responded to the
6 Investigator's questions with the following responses:
7

8 RECORDED STATEMENT BY INVESTIGATOR:

9 Q: My name is Gerard Trimboli. Today's date is April 21,
10 2006 and the time is 4:45 p.m. hours. I am interviewing
11 Patricia Harris-Lee regarding a claim filed with Tokia
12 Marine Nichido Fire Insurance Company. And their file
13 number is WCT000018709. Miss Lee are you aware that I'm
14 recording this conversation?

15 A: Yes.

16 Q: And do I have your permission to continue?

17 A: Yes.

18 Q: All right. Can you please state your last name?

19 A: Harris-Lee.

20 Q: Okay and your first name?

21 A: Patricia.

22 Q: All right, Patricia, where do you reside?

23 A: 66 Lexington Avenue, Jersey City.

24 Q: And your telephone number?

25 A: 201-369-1801.

1 Q: And what is your date of birth, ma'am?

2 A: 10-14-67.

3 Q: Okay. Who are you currently employed by?

4 A: Sony BMG Music Entertainment.

5 Q: And how long have you been employed?

6 A: Since 1991, September, 1991.

7 Q: And what is your current position?

8 A: I am Associate Director of Advertising Management.

9 Q: And what is your work schedule?

10 A: Regular...5 days a week, 10 to 6. Sometimes overtime. I
11 stay 40 plus hours.

12 Q: So basically, Monday through Friday...

13 A: Yes.

14 Q: 10 to 6.

15 A: Yes.

16 Q: Okay. I want to direct your attention to March 30th of
17 this year. Um...a recollection of a meeting that took place?

18 A: Yes. It was a lunch that I had pretty much initiated
19 with my supervisor to, you know, just go over some things
20 that was happening during the morning and this required
21 that.

22 Q: And your supervisor is?

23 A: Barbara Wornock-Logan.

24 Q: Okay. When you set up the meeting...

25 A: It was a lunch.

1 Q: It was a lunch. Was she made aware of that there would
2 be business discussed, or was she...

3 A: We...

4 Q: ...under the impression that this was just a lunch?

5 A: ...We...she was aware that I wanted to talk to her
6 about...uh...Dennis Santorino's request of my help for the
7 immediate move, yes.

8 Q: And how long...when did you make her aware that you
9 wanted to sit down and have this meeting and this lunch?

10 A: Uh...I asked her was she feeling like having lunch
11 between the hours of 11:30 and 12, because...you know,
12 uh...because I was working helping out at that time so I
13 wanted to know if she could have lunch if she was up to it.

14 Q: And she agreed?

15 A: Yes, she agreed.

16 Q: Okay. And...

17 A: And I asked her to pick what she wanted to eat.

18 Q: And where did the meeting occur?

19 A: Because it was...her office is the biggest office in our
20 department, it was in her office.

21 Q: Okay. And the agenda of the meeting I understand was
22 just to discuss the future...

23 A: It was...

24 Q: ...of the department?

25 A: No, it was not. There is no set parameters. Um...before

1 the meeting I was speaking with Dennis Santorino outside
2 her office and when I sat down to talk to her, it wasn't a
3 scheduled type thing. She asked me what happened Dennis.
4 What he asked...what did he want me to do and I started
5 explaining to her. Right after I explained that to her I
6 knew that Rob Henzi, Escaban Richberg and Brendon had some
7 other questions but I knew...but I didn't know if they were
8 going to address them but Rob started to address them.

9 Q: Okay. And in that meeting, is Rob asking specific
10 questions?

11 A: Yes. Rob is asking...uh...since this...Rob is saying...he goes
12 right into since we're discussing media, you know, he
13 starts asking her what...why is media moving on this floor
14 and why has media been a part...and just everything...what's
15 happening with...that...he sees that they were changing other
16 departments and we're still...

17 Q: So basically, everybody's concerned about...

18 A: Everyone's...

19 Q: ...what their future is in the company.

20 A: Yes. Because...yes.

21 Q: Okay.

22 A: Because, you know, media is moving here. Barbara has
23 had prior conversations with each and every one of them
24 about media, so yes, they just...we wanted a consistent
25 statement.

1 Q: Okay, now, during that meeting okay...is there any point
2 where there might have been some type of outburst by
3 Barbara?

4 A: Yeah. Barbara got extremely angry at Rob's questioning
5 and she started to raise her voice and use profanity. She
6 stated that, you know, she had just had her baby checked
7 out was the exact term, and you know, she's emotional and
8 you know, she just...it...yeah. Basically, she didn't
9 understand why she was being questioned or why he
10 questioned her.

11 Q: How long did this meeting take place?

12 A: Um...after...I would say like about half hour...half hour,
13 forty minutes. Right after that, Escaban comes in and he
14 says I guess he could feel what was happening in the room.
15 He says he wants to be a part of the conversation.

16 Q: Now, did anyone else have any type of...or did Barbara
17 have any other...uh...anger?

18 A: She was...she was...she was showing signs of anger. She
19 didn't...she stopped yelling at him. Rob asked her to stop
20 yelling at him and cursing at him and she stopped. And I
21 asked her, I just said, you know, Barbara calm down. We're
22 just talking. We're just...we're just having a conversation.
23 You know, we just want to find out what's going on and she
24 calmed down and then Escaban had questions...he was the one
25 asking her questions about, you know, how can we help if

1 she's trying to get..you know, really get this position
2 with media then let's talk about, you know, putting
3 together a proposal.

4 Q: Did...

5 A: And then Brendon started with questions.

6 Q: Did you personally have any interaction with her as far
7 as negatively?

8 A: Not in the meeting. I had very little to say. I
9 was...yes, not in the meeting. I had very little to say. I
10 was pretty much listening.

11 Q: And how would you say the meeting ended? Apologies by
12 Barbara?

13 A: Barbara apologized to Rob and it ended. She had the
14 outburst and then it ended.

15 Q: Okay. Did any...did any discussions occur after the
16 meeting?

17 A: No, we all left her alone. We could see it bothered
18 her.

19 Q: And so everyone continued on their regular...

20 A: Yes.

21 Q: ...duties...

22 A: Yes.

23 Q: And no interaction with Barbara...

24 A: No.

25 Q: ...throughout the day?

1 A: No. We worked around her.

2 Q: Okay. I want to direct your attention to the next day,
3 which is March 31st of 2006. And you arrived to work at your
4 normal time?

5 A: Normal time.

6 Q: Okay. And did you...do you have any interaction with
7 Barbara initially?

8 A: I could feel that there was some, you know, there was
9 still tension so I didn't really interact with her until
10 like the end of the day. I was still trying to help Dennis
11 finish up the move that day and I touched base with her
12 around 5. Between 4:30 and 5.

13 Q: Okay. And when you say you touched base with her, what
14 was that?

15 A: This is the end of the day. It's Friday. I wanted to go
16 home. You know, it was a long week and that's pretty much
17 just to pack it up...

18 Q: Okay. Did you ask that you wanted to leave early that
19 day?

20 A: Yes. I told her I'm done. Things are...just gave her a
21 status and said I would like to leave at 5 if that's okay.
22 She said that was fine and then the subject of why I was
23 helping Dennis with the move and um...helping Chris collect
24 the art work from the offices came up. Which caught me by
25 surprise, because that's just...I thought that was obvious.

1 Q: Now.

2 A: Chris (last name unintelligible) being, you know, the
3 head of the Creative Services and Dennis Santorino...

4 Q: Now before you left, had you...before...did you go in once
5 to ask her...to tell her you'd like to leave?

6 A: I went in to ask her. She...yes. And that's when the
7 subject came up with Dennis. Then I mentioned to her, you
8 know, that technically what I was doing for Dennis was
9 after work hours and I'm on my own time. Um...and because I
10 didn't understand why she was...why she was taking an...you
11 know, issue with that. And I walked out after that and I
12 came back to say, okay, I'm leaving for the night and then
13 the situation came back to Dennis and then I asked her
14 was...is it really about Dennis. Is the conversa...Is this
15 really about Dennis, like her issues.

16 Q: Okay. And that...what do you think the issues were?

17 A: I think that Barbara was somehow still offended over
18 the questioning of the meeting yesterday and the fact that
19 she had...she was embarrassed by her outburst and a lot of
20 times...she is. I mean a lot of things that I've witnessed in
21 the past is embarrassing but, you know, and I think she...she
22 did realize that it was. Because we were all shocked by it
23 but I think she...she wanted to get at me for it. She felt
24 that I was responsible.

25 Q: Because you asked for the luncheon.

1 A: Because I asked for the lunch.

2 Q: Okay.

3 A: But I had asked her for lunch on Tuesday when she...and
4 she declined and I was not try...on Tuesday I was just asking
5 for her and myself so I didn't expect to see her on
6 Thursday. And I thought we could follow up on Thursday when
7 I asked again.

8 Q: Okay. So after you walked into the office and you have
9 the, you know, you're looking to leave now...

10 A: Um-hum.

11 Q: ...did the...did this discussion become somewhat heated?

12 A: It was...it's heated.

13 Q: Okay.

14 A: I uh...I you know, I felt like Barbara was being
15 hypocritical in her statements about me. And I used the
16 word hypocritical. And when I asked her what it really was
17 about, she says to me, well, as a matter of fact she felt
18 like I ambushed her in the meeting on Thursday. She used
19 the word ambushed. She felt that I ambushed her. And I
20 said, I knew it. Because the animosity and the
21 questioning...just...it just all made sense. That she was
22 blaming me for Thursday's meeting. And I just decided to
23 forward with Barbara and say that, you know, she's tak
24 it too personal. She didn't like the fact that I was
25 saying...that she was taking it personal. She got up to le

1 and then I followed her out the door at which time she
2 turned around and started attacking me verbally and she
3 rushed in my face up in front of me just dusting her
4 hands...both hands...just shaking and yelling saying on both
5 sides of my face with her hands and you know. Shocked,
6 frightened. I grabbed her hands not knowing where it was
7 going. I was back up against the wall. And I asked her to
8 stop. I asked her to calm down, you know, for a moment
9 there, she released you know, we broke and she...proceeded to
10 say just some real strange derogatory things to me. And
11 um...after a few minutes she got on the elevator and left and
12 then that was the end of that.

13 Q: Okay. I want to get a little bit more details on the
14 physical...

15 A: Um-hum.

16 Q: ...contact.

17 A: Um-hum.

18 Q: That was made. We can't see this on tape...

19 A: Yeah.

20 Q: ...as I mentioned to you I'm asking your actions and
21 what...what Miss Lee is doing. Is she putting up her hands
22 side by side in front of her face...

23 A: Um-hum. Um-hum.

24 Q: Almost like in a defensive posture.

25 A: Yes. Like that.

1 Q: Okay. Did she touch you at all or did she...

2 A: She...she didn't get a...she's close. She's shaking her
3 hands and she didn't get a chance to really hit me because
4 I'm restraining her. I don't know what her...I don't know how
5 far it's going. I don't know where her hands are going. I
6 just know they're uncomfortably in my face area.

7 Q: Okay.

8 A: She's shaking and she's yelling and I'm just holding
9 her saying with my face sort of turned and my back...leaning
10 way back saying, you know, against the wall saying...Barbara
11 stop. Barbara calm down. Um...you know, and I'm hearing...a lot
12 is going on. I mean there's just...she's...she's just...she
13 breaks away. You know. Puts her hands down and just you
14 know, yelling and saying things and she just goes off into
15 the elevator and you know, whatever. There's a sign...there's
16 a sign...I tell her okay, whatever. But don't worry about
17 nothing I'll take care of it...and...the department, and she's
18 on the elevator and I just collapse on the reception area.

19 Q: Okay. When she uh...what time does Barbara work until
20 that day?

21 A: It was...we were...uh...

22 Q: Both work until 6:00?

23 A: We both work until 6:00.

24 Q: Okay. You were...you were leaving earlier.

25 A: I was leaving earlier, yes.

1 Q: And after this conversation takes place between the
2 both of you and you have the disagreement...you're starting
3 to get to the bottom of why she may be angry at you is
4 because of the meeting the day...

5 A: Yeah.

6 Q: ...before.

7 A: Yeah.

8 Q: Okay, so it becomes somewhat of a heated discussion and
9 Barbara decides she wants...she's going to leave.

10 A: Because she...yeah, cause I...I was...I was being...I decided
11 at that moment that I would be honest with her about...I just
12 decided to...to...to say you know, this is not personal. The
13 meeting was not personal, you know. There's a lot that
14 these guys have on their minds. There's a lot that I have
15 on my minds. Things are going on. Dennis is looking at
16 offices. It's not about you. It's not personal and when I
17 said that, you know, it's...she reacted. It was just like,
18 you know, again...a...she reacted.

19 Q: So she got...she went to grab her coat and she said...

20 A: She got up...

21 Q: ...she was going to leave?

22 A: No. She just...she didn't say anything. She just...when I
23 said it's not personal she just got up. Angrily got up. And
24 she started to grab her coat, opened the door and I
25 walked...I'm walking behind her, you know.

Q Now are you going...are you leaving also?

A: I'm leaving...

3 Q: Or are you just going to have pleasant conversation?

4 A: ...I'm ready to leave too. Because obviously when I said
5 that I could see...I mean, I'm dealing with someone I've
6 worked with for four years and I've known...I know when she...I
7 know what she can handle. You know what I'm saying? I know
8 when it's useless. So I'm walking out behind her to leave
9 too, and she turns.

10 Q: Now how close...how close would you say...

11 A: A few feet...A few feet.

12 Q: Okay.

13 A: She turns you know abruptly. And there's only one place
14 I can go and that's against the wall. You know, and I
15 jumped...you know, I backed up and then she starts shouting
16 something about me...if I want to run the department and then
17 it just goes on from there. And then when I say well, why
18 do you...what do you want me to do, Barbara? You are
19 responsible for these people. You know. She just leaves.
20 You know, it's like a few feet. Just to make it...I guess her
21 point very clear to me as a matter of fact kind of way. You
22 know. And the hands go up and they're on both sides of my
23 face and all I see is her face in my face and the hands
24 are...and I'm like this with my hands. Just...just stop
25 because...

1 Q: So you grabbed her hands.

2 A: I grabbed her hands because I don't...I don't know how
3 far they're going. I just know they're on the sides of my
4 face and I don't know where this whole situation is leading
5 to and I'm trying to like...she's...she's over me. Barbara's
6 5'10" and what am I? 5'5"? 160 pounds...there's a huge
7 difference in our size here. There's a restraint...I'm just
8 restraining the situation because she's...she's pretty...she's
9 pretty...I'm...yeah. This is a real dangerous situation I feel
10 myself in and I'm also don't want it...don't know where it's
11 going to go.

12 Q: So her hands go up...

13 A: In front of me...

14 Q: ...and she lunges at you...

15 A: Yes.

16 Q: ...but she doesn't...it's not like she strikes at you.

17 A: She's just...she's...she's...she's not in this respect and
18 this is...her hands are right there.

19 Q: They're a little close for comfort.

20 A: Yes. She's standing right in front of me but her hands
21 are here like on both sides of my cheek. It's like um...I
22 don't know...

23 Q: What you're trying to explain to me because we can't
24 see it on tape is...

25 A: Yeah. She's hovering. She's a tall woman.

1 Q: Yes.

2 A: Hovering with her hands in my face, you know, there's
3 no place for me to go. I'm just trying to hold her to keep
4 her from hitting me. Because the truth of the matter is I
5 don't know what my reaction is going to...you know, I don't
6 know what to do. I'm feeling very threatened. I'm leaning
7 as far back over the wall as I could. Everything is running
8 through my mind. This woman is yelling things about the
9 death of my children...she wished miscarriages on...just you
10 don't... I mean...

11 Q: Okay.

12 A: It was a scene, okay? And I've never seen anyone like
13 that. This is...one experience is enough. Too much.

14 Q: Okay. And we're going to keep going over this because
15 this is very important...

16 A: Yeah.

17 Q: ...before I move on to other questions.

18 A: Yes.

19 Q: If Barbara was going to hit you initially she had ample
20 time to do that.

21 A: I'm not sure about that...

22 Q: No, no, no. Let me finish. Okay, it's not as if she was
23 angry to want to punch you or do something like that, it
24 was easy enough to do that at that time.

25 A: Um-hum.

1 Q: And if I'm understanding you correctly, well that was
2 not done, you felt threatened by the size of the woman and
3 she was...

4 A: I was violated...

5 Q: ...just in your face. She was very close to you.

6 A: She was...I was violated and we were locked and she was
7 hovering over me. We were locked together and her hands
8 were very in my face. I don't know if it was to hit...I...I
9 don't know what she was...I don't know where she was going. I
10 was very...I was very concerned with where it was going and I
11 just wanted to protect myself from not being hit or not...the
12 situation not going any farther from where we were.

13 Q: So you put your hands up as you're indicating...

14 A: I put my hands...I grabbed...

15 Q: ...and then grabbed her hands.

16 A: ...her hands to get them away from my face.

17 Q: Okay. Correct.

18 A: To keep her off. She's standing close enough to kiss
19 me if she wanted to.

20 Q: That's all...I just wanted to paint the picture of the
21 proximity of her to you, the hands, the face...

22 A: We were...there was...

23 Q: ...what you did.

24 A: Like I said, there is...there is an obvious overpowering
25 in that situation because Barbara has me by at least 5

1 inches. You know, she's a very big woman and I was...I was
2 being...space just everything...just violated by this woman and
3 she was hysterical. I've never seen anything like it. So,
4 like I said...

5 Q: In putting your hands to defend yourself, not knowing
6 what might happen...

7 A: Um-hum.

8 Q: ...did you have to apply a lot of force? Was she pushing
9 back...

10 A: I wasn't...

11 Q: ...you or...

12 A: I wasn't trying to hurt her. I just wanted...I just
13 wanted some space between her and I because she was just
14 too...she was just in my face. She was...as a matter of
15 fact...you know...she, you know, I can't...she was in my face as
16 a matter of fact. I think maybe it was her intent to scare
17 me at the time. She succeeded. I don't know what she was
18 trying to do. I just wanted her to get the hell away from
19 me and back off That's pretty much where it was.

20 Q: And while your were holding her hands back...

21 A: Right.

22 Q: Was she just stationary or was she trying to get...back
23 to what you...

24 A: She was yelling and up in my face like leaning towards
25 me and I was leaning way back like against the wall. Like

1 just keeping...some of this...like...just...just restraining. Just
2 please, you know, just stop this. Calm down, thing. If she
3 moved forward with her (unintelligible) I was
4 moving...just...just in the position of defense.

5 Q: So...

6 A: Keeping way back.

7 Q: The point I'm trying to make is that if you...you pointed
8 out the size of each of you and the body frame. In your
9 defensive moves to put your hands up did it seem like...

10 A: It was...other than...

11 Q: ...she could have...she could have...

12 A: I didn't just put my hands up. I grabbed her hands to
13 keep them...

14 Q: Yes.

15 A: ...from going wherever they were going to go. It was...
16 They were just...

17 Q: But did you feel she...was she applying pressure to you...

18 A: I...

19 Q: Your hands were just hold on her hands was enough to
20 like stop her and she did not continue.

21 A: I was in a grip.

22 Q: Okay.

23 A: And I...I felt like I wasn't letting her come any more. I
24 wasn't going to let her go any more.

25 Q: But that was enough to stop her.

1 A: It stopped her.

2 Q: Yes.

3 A: And I...she...just stopped her from doing anything else.

4 Q: Yeah.

5 A: We just stood there and I, you know, I listened to
6 whatever she was yelling and she...she stopped and we broke
7 and then she went to the elevator.

8 Q: How did you decide to get how much force you may have
9 needed to do that or was it a lack...

10 A: I...I was...come on. There's no me forcing Barbara to do
11 anything. I just.

12 Q: Physically, I'm saying. Physically, I'm saying.

13 A: Physically...that's what I'm talking about. There's no
14 forcing her. She's...there's no forcing her. If she wanted to
15 give...you know. The size difference...there's no...I just...was
16 protecting myself.

17 Q: Right. So now you...you...you...

18 A: I...I...because I did...

19 Q: ...you did what you had to do.

20 A: Yeah. I did what I had to do which what I thought to do
21 at that time and I should just grab her hands and because
22 where's this going to go? Is it going to go to how
23 far...and..

24 Q: What...what...

25 A: ...you know...

1 Q: What I'm trying to establish is that in my opinion...

2 A: Um-hum.

3 Q: ...uh...that the anger at the time...

4 A: She was just very angry.

5 Q: ...and you...

6 A: Monstrous angry. Things...and that's what scared the hell
7 out of me.

8 Q: Now as you just pointed out and that's exactly what I
9 was looking for. The answer was that...you defended yourself
10 with what you felt you had to do. And you had to do it.

11 A: Yes.

12 Q: I'm trying to get at the amount of force. If Barbara
13 was wanting to get at you at the proximity, it could have
14 easily been done.

15 A: If I had...no. What I'm saying is if I had to use more
16 force to protect myself I would have. You asked me...

17 Q: But you didn't have to.

18 A: ...I was not trying to be accused of hurting her.

19 Q: No.

20 A: That's for sure. But I did grab her to keep myself from
21 being hit. That's what I did.

22 Q: Okay.

23 A: Yes. To...from being injured or you know. Whatever was
24 going on, I was just protecting myself and that's...

25 Q: Other than the contact issue you've just gone over in

1 length, was there any other contact on your person? By
2 Barbara? Other than the touching of the hands?

3 A: Other than that, there was no more touching.

4 Q: Uh...how long have you known Barbara?

5 A: I...okay. I've known Barbara since I worked for the
6 advertising department. That's a total of 12 years even
7 though I've been at this company longer. And when I say
8 I've known her, it's not like we were close friends or
9 anything. I just...I see her. We speak. We've worked together
10 on some projects. I've known her...I've got to know her more
11 in the last three and a half almost four years when she
12 became our supervisor.

13 Q: Was your relationship with her work related only?
14 Do you see her on the outside?

15 A: I would...I prefer to keep it that way. I try to keep it
16 that way even though it's difficult. I have been known to
17 go...I went out one time um...after work with her and the other
18 managers for a drink but...and in four years, but that's just
19 one time.

20 Q: Have you ever like visited her home or anything like
21 that?

22 A: I was invited to her Christmas party and I did go to
23 her Christmas party um...as did the rest of the staff. One
24 time.

25 Q: Prior...prior to the incident on the...well, the meeting on

1 the 30th...what was your relationship with Barbara? Strictly
2 professional?

3 A: Um...on my end yes. I try to keep it very professional. I
4 felt like...I...I...there was...it gets too personal on Barbara and
5 I felt like I know more about her than I should know and I
6 felt like um...that...I just...just didn't feel that comfortable
7 with the amount of the neediness of Barbara. The personal
8 neediness if that's what you want to say.

9 Q: Your current position is Associate...you said.

10 A: Yes, it is and Barbara is the Director.

11 Q: How did you get that position? Is it an appointment...

12 A: Um...Nadine which was the previous Associate Director
13 left in July and then uh...Nadine and I were the oldest
14 advertising people in the department before Barbara became
15 our boss, so I mean, it was a natural process. I'm the
16 next in line. The more experienced. The other three
17 managers, the oldest one has been here two years. And
18 um...most of them I helped train.

19 Q: And how long have you had this position?

20 A: Um...this is just a year. Sadly enough.

21 Q: As far as the incident in the...in the hallway, did
22 anybody see it?

23 A: Um...people...people heard it. There's a wall that's there.
24 No one's seen the actual attack but they heard...

25 Q: Well, if I needed to speak to anybody...

1 A: David Bet to be exact. Heard it.

2 Q: David what?

3 A: B-E-T. Bet.

4 Q: Okay.

5 A: He is the art director. The senior art director who
6 heard a good deal of it.

7 Q: Okay.

8 A: The cleaning lady. Her name is Donna. She heard a good
9 deal of it and actually she witnessed Barbara hysterically
10 getting on the elevator. Um...those are the people who
11 admitted to...to...to...

12 Q: Have you sustained any injuries from that incident with
13 Barbara?

14 A: Yes. My health has been deteriorating since the
15 incident.

16 Q: In what respect?

17 A: My back is in a constant state of pain. Um...uh...lots of
18 pain. There's stress. There's anxiety because I'm still
19 dealing with that situation. There's lot of
20 (unintelligible). There's the loose stool. There's bad
21 nerves. Everything is just going downhill from here and
22 it's one...um...you can get the doctor's report on that...

23 Q: And...

24 A: I don't know.

25 Q: And you're attributing these injuries to that

1 confrontation on that day?

2 A: It happened...the confrontation happened and before that
3 I was perfectly fine. Now I am...I don't know what the state
4 of my health is so yes, I am. I'm contributing...

5 Q: When were you first aware that you might have sustained
6 this injury?

7 A: I was aware of the physical impact on my body the night
8 of the attack where I could not stop shaking.

9 Uncontrollably. Shaking. My heart was pounding. I was in a
10 very state of anxiety. Heightened to the point where I had
11 to walk around. The office space you know, just to bring
12 myself back to the reality of where I was and everything.
13 And there are moments, you know, where I still have the
14 nervousness and shakes but it's, you know, all the anxiety
15 of this situation.

16 Q: Did you report what had happened?

17 A: Yes. The night...I started to report it to security and
18 then Barbara left me this message that...discouraged me from
19 doing that so I decided to report it Monday. Because the
20 incident happened Friday night, I went first thing on
21 Monday and reported it to Kathleen Kelly. Not only did I
22 report it, but I let her hear the message Barbara left on
23 my machine in which she admits to attacking me.

24 Q: All right. Did you request that anything be done?

25 A: Yes. Well, she...she...Kathleen said to me that well, you

1 know you'll have to speak to Adam and I said I know I said,
2 because it got physical and I said...I said...you know, we've
3 had our disagreements but this is different and whatever
4 needs to be done from here on because it got physical and
5 because of the nature of the situation I'm prepared for it
6 so speak to Adam. Do what you have to do. There's no
7 turning back.

8 Q: Adam is the...

9 A: Adam Owett is Barbara Wornock-Logan's supervisor. And
10 she said that she would and she would get back to me. And
11 um...two weeks...it was two weeks later and nothing happened.

12 Q: And that was done on the 3rd...

13 A: That was done on the 3rd.

14 Q: Okay. That was after the weekend you brought it to
15 Kathleen's attention.

16 A: I brought it to Kathleen on April 3rd. The incident
17 happened on March 31st so I brought it to her attention on
18 April 3rd. She told me um...she took, you know, she heard what
19 I had to say or whatever. Heard the tape. You know. Told me
20 what she would have to do and that would include speaking
21 to Barbara's boss. I told her whatever, you know. It
22 happened, it got physical and I'm really uncomfortable with
23 Barbara. I don't trust her and you know, a part of that
24 trust has been...just...just in general. It wasn't just the
25 incident. It's just been a building mistrust of Barbara's

1 um...for...you know. For a while in me. And I just really am
2 uncomfortable working with her and taking her, you
3 know...just...this is a bad situation so whatever you have to
4 do. Speak to Adam and you know, let me know. And um...days
5 went by and in the meantime, my back which is...it was just
6 getting worse. My condition was getting worse. I was
7 getting stressed out dealing with not hearing. Sending
8 memos. Barbara at this time was coming in and out of my
9 office. You know. And that was making me angry...anxious
10 because I...you know, I thought about it. I didn't know what
11 it could have...I was afraid to be alone with her.

12 Q: When you say she was coming into your office is that
13 kind of necessary for just a work...

14 A: Yeah. I mean, she would come in to say stuff to me but
15 a lot of it...I mean, usually if we were working on a
16 project, it would be project related. Barbara came in and
17 she...to my office, you know, while I'm waiting to hear the
18 outcome, she comes in one day. This is really what
19 triggered me to just...just...just take care of my health is
20 that she came in one morning and she was like I just wanted
21 you to know that I'm extremely uncomfortable with our
22 situation and I can't wait until it's resolved. And she...I
23 was sitting there and she was standing up over me and I
24 said okay. And she just walked out like...and I sat there
25 thinking you know about. You talked to me. Everyone seems

1 to be getting your opinion and you're going to sit here and
2 tell me you're uncomfortable when I can't even shit
3 straight? I was just beside myself so I called and I
4 started to feel really bad. I called to see if I could get
5 a referral to see the doctor...um...Basil. And when I saw Dr.
6 Basil he asked me...he examined me, took my blood pressure.
7 Said it was up. And everything and he asked me to explain
8 why I'm in the condition that I was in with my back, the
9 blood pressure, what happened. I explained the situation.
10 He contacted Worker's Comp and now we're here.

11 Q: Dr. Basil being a chiropractor?

12 A: He is a medical doctor who...uh...chiropractor, yes, but
13 he's also a medical doctor.

14 Q: Have you had any previous problems with Barbara?

15 A: Um...I've questioned...I went...I haven't had like uh...I've
16 questioned Barbara's professionalism in the past, yes.

17 Q: Anything specific?

18 A: Uh...just in terms of the favor...her male favoritism. Just
19 the fact...I felt like, you know, her going out drinking with
20 the guys as often as she did and then trying to establish,
21 you know, work afterwards. It gets a little...some of it I
22 just felt like you get hired to be a manager and
23 then...constantly I'm going out after work socializing with
24 the guys and uh...and then also, you know, if I'm trying to
25 manage them that's difficult too, because they're out

1 drinking with her all buddy, buddy and you know, there's
2 stories about flirting and dirty dancing and you know, I'm
3 coming back and I'm saying I need your time sheets or...and
4 it's difficult for me to be...to penetrate that. Do you know
5 what I mean?

6 Q: Did you ever bring that up to Barbara...

7 A: I did. We had issues in January. That's what I was
8 saying. I questioned...that was like the first time we had
9 real words. I mean...where I expressed that because before it
10 was Nadine's issue. Okay? A year ago. Nadine Cancell, the
11 one who left, it was her issue. Now it's my issue. It's my
12 issue because I have to deal with Barbara. I have to do
13 their timesheets. I have to get called if something's not
14 right. I have to proofread their work. I'm also still
15 bringing them up to date on policies.

16 Q: What...

17 A: So I did address it with Barbara and I said I just
18 think that she's...she...I just think she favors her behavior
19 towards the guys which I felt she...showed a lot of
20 favoritism with them and the fact that she has a scheduled
21 relationship of going out after work...

22 Q: Well...what...what favoritism would she show?

23 A: Okay. Like...okay...there was...here's the difference. When
24 we were an all girls' department. Four girls. Four woman,
25 let's say were written up. Yes, there was a warning and

1 then there was a write up. Okay? But two things...they all
2 got written up. Four okay? That would be lateness or
3 whatever. They got written up and some I didn't even know
4 about until Lisa Munoz, (unintelligible), but um...with the
5 guys there was...there was very evident behavioral problems
6 with one of them in the beginning. And I mean we're talking
7 about complaints from senior art directors and everything.
8 I mean, lateness, insubordination. There was another problem
9 with another one that uh...and this...this person...and she
10 warned them. I mean...I can vouch for how many times she
11 warned them and then there was another situation where one
12 guy had ruined a project. Um...not once, but twice. I mean
13 there was...part of our job is to be accurate and proofread
14 and everything and where we had...it cost us to reprint which
15 was like a catalogue or something. And this is not just one
16 instance. It was the same guy who made the same mistakes
17 and just have a rough time in the beginning getting it. Not
18 one write up. Since in the two years we've been a male
19 department, not one write up. And I'm saying these are the
20 guys I've seen them go out drinking when...I know...I've heard
21 the stories when they come back about the flirting and the
22 dirty dancing. And even asked you know, to have certain
23 things done in terms of time sheets, or just in general,
24 you know, if I needed something. It's not easy. Because the
25 relationship is just too casual I felt with them. And then

1 when I tell them something...there was an incident um...with me
2 and one of them where Barbara's out and I need someone to
3 cover for me. It's almost about 3:00. I haven't gone to
4 lunch and I asked some...I asked one of them to cover for me
5 which is an exact example of what I'm saying. I say,
6 Barbara's out. I haven't had lunch. I'm just going to run
7 and get something and if anyone's looking for me I'll be
8 back. I'm coming from Lexington getting a sandwich and I
9 see the same individual on the street and it's like a
10 quarter to four? And I know from my walking around the
11 office earlier I saw that individual eating lunch at his
12 desk. And okay, I say...you know, I was like I see him on the
13 street and I'm just like what? You know. I mean I didn't
14 say anything to him but I was shocked and then, you know, I
15 waited until he got back and I casually mentioned it and I
16 said, you know what...you know why didn't you wait until I
17 got back or you know what were you doing out? And he
18 just...he just...like it was a matter of fact I mean, this
19 isn't someone I trained. You know. He just said as a matter
20 of fact told me well I didn't say anything about the time
21 that you went to lunch and I'm like well, you don't get to.
22 You don't get to tell me anything about the time I go to
23 lunch. You know what I mean? My point was...why couldn't you
24 have waited if you were hungry? It was just a lack of
25 professionalism. I explained that to Barbara. And as a

1 matter of fact, Barbara was out the day that it happened. I
2 didn't call her but the individual that I had this
3 conference with called her at home and told her their side.
4 That's how casual it is. And it's like I sent some e-mail
5 later on to let her know what happened that day. And I said
6 you know, there's a true lack of professionalism. You're
7 gone. I just wanted to go out. Couldn't he have waited? If
8 he got hungry again...he said he got hungry again and he felt
9 by my questioning him he felt that tact was his reasons for
10 what he did and I was like Barbara I was like...and...and I had
11 to defend that. But I was like, first of all, he wouldn't
12 have done that if he didn't feel like it was okay. And then
13 to call you at home, I don't even call you at home.
14 It's...it's...I just questioned in the past the casualness.

15 Q: But as far as any favoritism, now...are you all on the
16 same equal plane?

17 A: Uh...no, because I've been here longer.

18 Q: Okay.

19 A: But I found out in January even these same individuals,
20 all three of them had gotten raises in January. It was an
21 off schedule raise. I don't know the reasons. I'm not going
22 to say I know the reason. But I have been addressing my
23 salary issue just with Barbara because I have a two page
24 job description. I'm not only senior ad manager but I also
25 do administrative stuff. There are some stuff...like supplies

1 and stuff I kind of took that 'on because we kind of lost
2 our secretary. Our administrator. But there's a lot of
3 special projects and things that I've taken on and
4 researched because I am here longer. I know...you know, I can
5 do a five year research. I know what the projects are and
6 they don't. And I wanted to discuss those issues with
7 Barbara and I tried to discuss them with her before last
8 year before the um...layoffs and she told me that the layoffs
9 were coming and it was a bad time for to discuss raises.
10 But then, in January, I find out that these guys got raises
11 during the Christmas holidays. And I was thrown by it. I
12 was really taken back by it.

13 Q: You brought that up to Barbara?

14 A: I brought that up to her in January before she started...

15 Q: And what was her reaction?

16 A: She tried to justify it by saying that...you know, her
17 thing mainly was with Escaban because she felt like...and I'm
18 saying Escaban because that was one of the reasons for the
19 raises that...you know, maybe he would do better in terms of
20 his professionalism if he made a little more money. That's
21 how she justified it. And...I'm...I mean how do you...okay. If
22 that's how you want to justify it but how do you say that
23 to someone who's doing what I'm doing. You know what I
24 mean? Who's training him with a two page resume, who's here
25 you know, doing administrative here, two hours a night. How

1 do you say that to someone about the same person who's been
2 you've been constantly whining about their behaviors.
3 They've been complained about from GA's to senior art
4 directors to...I mean, Chris (last name unintelligible)
5 himself, I mean how do you say well, he'll probably do
6 better if he got paid a little more. I mean, I just felt it
7 was.

8 Q: Okay.

9 A: But I just didn't...

10 Q: Yeah. I understand. I want to change the subject
11 briefly but particularly yourself.

12 A: Okay.

13 Q: Are you experiencing any financial problems at this
14 time?

15 A: No.

16 Q: Have you received any disciplinary action prior to the
17 incident?

18 A: I've never received any disciplinary action in fifteen
19 years that I've been here.

20 Q: Did you recently obtain or change your disability
21 policies?

22 A: I never...I don't know what that means. I've never been
23 on a disability policy. I don't know what that means.

24 Q: How is your personal life?

25 A: I've been with my husband for nine years. Married four.

1 He is very supportive. He calls me every day twice a day
2 since the incident. Um...you know, he's even offered to stop
3 by if I needed. Great. I have a wonderful husband.

4 Q: Okay. So what...the next question about you having any
5 problems with your husband we think we've already answered
6 that. Uh...do you have any previous injuries?

7 A: No. I had...I am an...I'm obsessed with getting into shape.
8 I started losing weight in January. Back on Weight
9 Watchers. I went...I've had my physical in January by Dr.
10 Dorton. All blood works checked out. I've gotten my breasts
11 annual exam in February. I do it...I have the same doctors
12 for years. So, no.

13 Q: As far as a chiropractor goes, have you been treated by
14 one prior to this incident?

15 A: No, Dr. Basil was...I stumbled onto Dr. Basil. I was
16 really just looking to find out what was wrong with...why was
17 I in pain. I thought maybe if I could get a nice massage or
18 somebody could just help me move my neck. And he did a
19 thorough and total examination. I...he's the first
20 chiropractor or back specialist I've ever seen. And he's
21 back, neck, joints, everything. He's a new doctor on my
22 roster.

23 Q: Okay. And I also want to make it known for the record
24 that Miss Lee has signed an authorization for medical
25 release so that we may be able to look into the specifics

1 of her...of her ailments...

2 A: Right.

3 Q: ...because she cannot specifically tell me because
4 she's...she's not a doctor.

5 A: Yes.

6 Q: She can only tell me how she's feeling.

7 A: Yes.

8 Q: And again, obviously I think we've gone over this. But
9 why did you go see a chiropractor back on April 14th?

10 A: Uh...wait a minute. I just want to make sure this date is
11 right. Um...gradual...gradual decline. Just gradual pain and I
12 was ignoring just trying to deal with what's happening at
13 work, I was trying to put it off. But it was an increasing
14 thing. The more I'm trying to deal with work and Barbara
15 and this situation of daily coming inside here. Not having
16 the situation addressed properly by Human Resources. It was
17 a daily, daily decline of my health. But the pain from the
18 back was the most obvious so I had to go see him. It just
19 required a doctor not a Tylenol from the nurses' station.
20 It just required a doctor. I couldn't...it got to the point
21 where the day before I could not lift my shoulder bag.
22 That's how it is. And it's still that way.

23 Q: Did you get any feedback from the doctor on what would
24 have caused something like this?

25 A: He explained it to me that there was some...when...for

1 every action there's a reaction. There was...there's some
2 trauma there. There's constant stress because I'm still in
3 the same environment. The issues are not being addressed.
4 There's a building of muscle...of nervous systems...like I
5 said, I gave numbers. I gave names.

6 Q: Okay, fine.

7 A: I gave addresses...

8 Q: You don't have to explain and we'll...we'll..

9 A: ...I keep...

10 Q: ...we'll rely on...

11 A: ...(unintelligible) as best I can...

12 Q: ...the report.

13 A: I'm surprised at my own physical state. I've never been
14 in this place before, mentally or physically, so...

15 Q: Can I ask you or I will ask you, have you at any time
16 in the past ever had a claim against an insurance company?

17 A: No. I didn't even know what Worker's Comp...how Worker's
18 Comp worked.

19 Q: Who...what is your insurance right now?

20 A: My medical insurance?

21 Q: Yes.

22 A: Is United Health Care. I chose it from SONY. I had an
23 option of Blue Cross Blue Shield. I chose United...

24 Q: Okay.

25 A: ...Health Care.

1 Q: And you've been...you've been with that...that...since you've
2 been employed?

3 A: No. Well, since yes. SONY BMG. When I was with SONY, it
4 was...the only option was Blue Cross.

5 Q: Yes.

6 A: At that time.

7 Q: Um...have you ever filed for any social security
8 benefits?

9 A: No, no.

10 Q: Okay. Okay. And the incident occurred, what day of the
11 week was the incident?

12 A: It was on a Friday.

13 Q: Okay. At what time?

14 A: It was the...the actual altercation was somewhere between
15 I'd say 6:30 and 7...7ish.

16 Q: And what floor did that take place?

17 A: The 29th floor.

18 Q: Anything specific like you can give me a point of
19 reference? Elevator door? Entry...

20 A: It was the two...between...it was...right outside the
21 two...right outside the walkway of Barbara's office is where
22 it started and then we...it moved to...we had words outside the
23 elevators, too.

24 Q: Um...as far as yourself is concerned, had you consumed
25 any alcohol that day?

1 A: I...do not drink. Um...I don't...I don't make a point of
2 doing it. Only if it's like on Holidays, special occasions.
3 I don't drink. I don't smoke.

4 Q: How about medications?

5 A: I'm not on any medications which is why I'm in a lot of
6 pain still, because I refuse to take the medication.

7 Q: Okay.

8 A: I'd rather a natural alternative.

9 Q: Does that hold true for any prescription...non or
10 prescribed?

11 A: Yes. Everything.

12 Q: And on the day of the accident, how were you feeling as
13 far as you know? Your physical overall being. Ailments,
14 aches, anything like that?

15 A: I was...I was...I was feeling really great. Actually, I was
16 feeling really great up until the altercation. I had just
17 lost like, you know, 18 pounds on Weight Watchers. I was
18 going to the gym. I was feeling great about myself. About
19 everything.

20 Q: At this point, do you um...you feel you have any
21 limitations?

22 A: My ability to focus. My ability to be effective at the
23 job that I do here for SONY. It is limited. I work in
24 advertising, I read proofread, I do legal information. I
25 communicate with a lot of people every day and

1 that's...that's strained. It's focus and...uh...everything. The
2 limits are extremely psychological and as far as physical,
3 I can't exercise. I've been advised to walk and get out and
4 walk. That's to calm my nerves and keep my stress down.
5 Walking is good, but the physical activity, lifting, I
6 can't do that until this back thing is resolved.

7 Q: Okay, since you've been seeing the chiropractor and
8 the...

9 A: Therapist.

10 Q: ...therapist...has it...is anything getting better or worse?

11 A: No. Um...we talked about that today. It's not getting
12 better. It's not...it's still in the state of where it is.
13 There's still pain because I'm reliving this experience
14 daily and weekly. I've given my testimony many, many times.
15 I come in...there's uh...I'm isolated. You know, there's a cut
16 off. You know. My relationship with my co-workers is not
17 the same. There's an effect there. So it's not going
18 anywhere. It'll be better once we...you know, it'll get
19 better but it's not getting better now. When I don't have
20 to talk about it, when I don't have to continue to play the
21 tape, you know, when I'm relaxed, when I'm calmer, when I'm
22 not angry about the way I've been treated, all of those
23 things the doctor said will relax my nerves and a lot of it
24 is really about trauma and nerves and that's where it is,
25 so like I said, let him explain it.

1 Q: Um-hum.

2 A: Because he has to explain it to me as the symptoms
3 become like, why am I getting numbness? In my arms and my
4 legs, you know, if I'm thinking about it. I don't sleep too
5 much at night because it's...I feel like I'm going through...15
6 years at this place, you know, and it gets to be...comes to
7 this. I'm you know, when I'm lying awake, you know, I'm
8 tense. A stiffness.

9 Q: Do you have any hobbies?

10 A: I enjoy working out. I enjoy going to the gym. I
11 don't...I have good friends. They call every day...my hobbies...I
12 like dancing. I haven't been...I haven't gone in...dancing...I...I
13 socialize with my friends. No real hobbies.

14 Q: As far...all right. As far as going to the gym, what
15 would you typically do in a gym?

16 A: I get on the...uh...it's like the elliptical machine. You
17 do the stair climber plus the arms. You...I get on that
18 because it's an aerobic things and that way you do more,
19 you know, aerobics exercises. So I get on that for about 45
20 minutes and then I'll do like the circuit weight training
21 where you lift light weights.

22 Q: Um-hum.

23 A: So I do that for like the other...for the remainder of
24 the workouts. And that would be it. So it's like an hour,
25 you know, a few minutes like that.

1 Q: How often would you do that?

2 A: Uh...it's basically, because the gym is here, it's
3 whenever works with me. It's like uh...for me it would be
4 like um...lunch hours mostly. And I really started...last year
5 I just...because of my...my relationship...the work relationship
6 with Barbara I really tried not to...I tried to...be in her...I
7 ate a lot with her and I talked with her and be with her,
8 sort of going along and get along and I didn't go to the
9 gym as much because we had just started working closely
10 together and I wanted to establish a good working
11 relationship, and like I said, there's a real neediness
12 there. And since I hadn't been doing this and in January
13 you know, if you don't really sit in the office and gossip
14 and talk with Barbara it's like...you become somewhat
15 demonized. You're being the subject of gossip. You know,
16 it's a weird situation.

17 Q: The uh...after...since...after the accident, you haven't been
18 able to do any of the weight training...

19 A: I haven't been able to...

20 Q: ...or the elliptical machines?

21 A: ...the gym since...I have not been...the doctor does not want
22 me to do the machine. He doesn't want me to do...when you're
23 doing the arms and the rotation thing, that's not advised
24 right now because it works your back and your shoulder so
25 you don't do the back. He just says that walking is good.

1 Um...but he would prefer like I would go outside because he
2 said something about the...the...if you walk on the treadmill
3 there's a...I don't know. Something about the bounce
4 absorption on the treadmill.

5 Q: Um-hum.

6 A: And...he just says, you know, some people get bad
7 reactions on their backs because they're walking on the
8 treadmill and that's because of the way it's built. It's
9 very...when they're trying to mimic the street or the same
10 effect, something happens, so don't do that. But go for a
11 walk, get out, try meditation. I mentioned that there is
12 Yoga here and the physical therapist used to...she's the
13 stress management. She's going to let me know if it's okay.
14 You know, like if I should...if...if...if...she's just the person
15 who meditate...just...no, don't move. Just sit there and
16 breathe and breathing exercises, that's what she said I
17 should do.

18 Q: Do you have a family doctor?

19 A: Doctor Karen Fullerton (sp?) And I gave my...her number
20 and everything um...to Adela? The secretary at the Tokio
21 thing?

22 Q: Okay.

23 A: Yeah. I gave all that information to her. She...I just
24 had an annual with her. She did my blood work. I can bring
25 you the charts of my cholesterol and everything. To show

1 you. I just had it done. I've got the results and
2 everything.

3 Q: So what...what part of your body are you experiencing
4 pain?

5 A: The...from the base of my neck to the...the spine...um...so
6 it's base, shoulder, spine. Um...that...that's the base of it.
7 I feel even right now as I'm talking, um...there's a real
8 intensity on the left side more so I guess because I've
9 been talking about it. But, right now what it still feels
10 like...uh...right now there's a ton of bricks and there's a
11 burning sensation and depending on my blood temperature of
12 how I'm feeling, it rises. It escalates. It goes up and it
13 goes down. When it's elevated, when I'm really, really
14 stressed, that pain...that burning sensation is no joke.
15 It...it...it gets your attention.

16 Q: And you haven't taken any medications.

17 A: I have...I was...I hadn't taken any medications before or
18 after uh...I have...I am a flexi person. I take flexi vitamins.
19 That's a natural vitamin for your heart; cardio-vascular
20 wellness and I've been known to take a multi-
21 vit...Woman's...One a Day Women's Multiple Vit...um...that's the
22 extent of it for me.

23 Q: Your pain. Is it dull or is it sharp?

24 A: It's sharp...It...it...it increases and decreases depending
25 on the stress levels and...and...and...and how I'm feeling and

1 it's sharp.

2 Q: Do you have any pain or numbness in your arms?

3 A: At...at...when it's folded, there's a certain amount of
4 numbness. I think that's because...there's a tension. The
5 doctor could tell you what that comes from. I asked him why
6 especially at night, when I'm lying there and I can't
7 sleep. And it's...everything's running through my mind. If my
8 arms are folded, there's no oxygen...there's like a cut off
9 of oxygen with stiffness...if something occurs. And I asked
10 him about that, too. And he gave me an explanation so you
11 can get that from him.

12 Q: Yes.

13 A: I don't know why it's happening. It doesn't seem to be
14 something I can immediately control right this moment when
15 it happens. Like right now my arms are folded, this arm and
16 this whole...I told you this whole left side? It's bothering
17 me.

18 Q: How many times have you visited the chiropractor?

19 A: Four since the incident.

20 Q: And how about the physical...uh...the therapist.

21 A: Uh...once because she's out of network and she's
22 expensive. So...and I hope to try to see her again. I
23 don't...I'm not sure. She's expensive. She's not a network
24 person, but the doctor felt like...

25 Q: Well, when you say expensive, what is the charge?

1 A: She's an hour...I think \$150 an hour.

2 Q: And would you have to see her for an hour at least?

3 A: Yeah...she's...yeah. She requires an hour that's her limit
4 and then...you, you know...but she had a lot to say. She's very
5 helpful. She does feel I need to see her again and that's
6 where it is. I don't know. Like I said, that's an expense
7 that I didn't anticipate.

8 Q: Uh...let's see. Have any x-rays been taken? Any parts of
9 your body?

10 A: Dr. Basil wants to address that this coming Monday,
11 which is...what is it, the 24th?

12 Q: Uh...

13 A: I guess next Monday would be the 24th. Um...because I have
14 not uh...because it hasn't gotten any better, so...but he feels
15 like there's two reasons for that. One is because I'm still
16 in the environment in which things have taken place and two
17 that maybe something, you know, there could be something
18 else. And he'll address that with me when I get there on
19 Monday.

20 Q: And who is that...your therapist?

21 A: Her name is Joann Piercery (sp?). She was recommended.
22 I have the card. I don't have her information in front of
23 me.

24 Q: Um...and as far as the treatments at the chiropractor?
25 What do they basically entail?

1 A: There's several but for now he's trying to get some of
2 the swelling down in my shoulder blades and my joints
3 relaxed so there's a lot of electrical therapy like shock.

4 Q: Okay.

5 A: I'm hooked up to some kind of machine that sends pulses
6 through my back.

7 Q: How about the therapist, what do they do for you when
8 you're there?

9 A: Uh...

10 Q: Is that a physical contact therapy?

11 A: It's not...it's not so much physical it's about managing
12 um...managing my stress level and talking to me about the
13 incident and just um...um...it's more like...um...both. It's
14 psychological and it's stress management. It's like, you
15 know, because you're in this environment where it's hostile
16 and there's animosity and things are going back and forth,
17 how do you cope with that. And she's talking to me about
18 how I'm feeling about the situation and stuff like that and
19 when I start to get angered or elevated or if there's a
20 conflict, because obviously it is affecting my health, she
21 wants to...until...you know, to try to develop ways for me to...

22 Q: Deal with it.

23 A: To deal with it, yes. Thank you.

24 Q: When do you normally go to see the doctor? The
25 chiropractor? Every other day? Every day?

1 A: Every other day, usually during lunch hours for one
2 hour and I'm back to work.

3 Q: Uh...do they have a sign in sheet there?

4 A: Yes, I sign, every time I go.

5 Q: And you found this chiropractor through a network?

6 A: Yes, I called my health care provider and I asked them
7 if they could provide someone I could go to during lunch
8 hour in this area because, you know, that would be the only
9 time I can go. Someone...you know, in the 50's, and they gave
10 me him.

11 Q: But do you receive any monies as of this date as a
12 result of the incident?

13 A: No, I haven't even received a how are you doing?

14 Q: Uh...okay. Is there anything else that you would like to
15 add?

16 A: Um...I think the situation is unfortunate all around and
17 I just would like to...it to be over as soon as possible. I'm
18 very uncomfortable. I don't see myself ever being
19 comfortable working with Barbara again and it's not just
20 the physical aspect or the not knowing what state of mind
21 she's in. There's that and there's just a lot that I'm
22 not...I'm not good with right now with her and um...I don't
23 feel like I...I can't continue to be productive. So I just
24 hope this gets resolved as soon as possible.

25 Q: Do you have any idea what resolving would be in your

1 mind?

2 A: No.

3 Q: Or what would you like to see done?

4 A: There's...there's...no. Um...I'm not...going to give any
5 recommendations at this time. I don't...I just...I would like
6 the company to recognize that I am an employee that has
7 been here fifteen years. I've never been...had an incident
8 like this. I've never been written up for insubordination
9 or anything. I would like them to give me the respect I'm
10 due and that's it. You know, I didn't just say something
11 happened to me. You know, something happened. The person
12 admitted something happened and you know, I'm...I'm at the
13 doctor's now and I can't explain why it happened. You know,
14 like I said, I would like to know why Barbara felt to
15 attack me and not the people who attacked her in the
16 meeting. Because I did not do it. I did not attack her. I
17 did not set her up and I think that was established. I
18 didn't expect to see her on Thursday, you know. And to be
19 honest, there is no, you know. There's just nothing else to
20 say.

21 Q: Okay. That's fine. At this time, we're going to
22 conclude the interview. And the time is 5:55 p.m. Thank
23 you.

24 A: Um-hum.

25 [WHEREUPON, THE RECORDED STATEMENT WAS CONCLUDE.]